IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

THE GILLETTE COMPANY,)	
Plaintiff,)	
v.)	C.A. No. 15-1158 (LPS) (CJB)
DOLLAR SHAVE CLUB, INC., DORCO)	
COMPANY LTD. and PACE SHAVE, INC.)	
Defendants.)	

PLAINTIFF THE GILLETTE COMPANY'S MOTION TO ENJOIN DEFENDANT PACE SHAVE, INC. FROM CONTINUING ARBITRATION

Plaintiff The Gillette Company respectfully moves the Court to enjoin Defendant Pace Shave, Inc. from continuing arbitration of this dispute. The grounds for this motion are set forth in Plaintiff's concurrently-filed Opening Brief in support of the motion.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/Rodger D. Smith II

OF COUNSEL:

Mark J. Abate Steven J. Bernstein Alexandra D. Valenti Tyler Doh GOODWIN PROCTER LLP The New York Times Building 620 Eighth Avenue New York, NY 10018 (212) 813-8800

Jennifer A. Albert Charles T. Cox GOODWIN PROCTER LLP 901 New York Avenue, N.W. Washington, DC 20001 (202) 346-4000

Jack B. Blumenfeld (#1014) Rodger D. Smith II (#3778) 1201 North Market Street P.O. Box 1347 Wilmington, DE 19899 (302) 658-9200 jblumenfeld@mnat.com rsmith@mnat.com

Attorneys for Plaintiff

Elaine Herrmann Blais GOODWIN PROCTER LLP 100 Northern Avenue Boston, MA 02110 (617) 570-1000

October 13, 2016

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE THE GILLETTE COMPANY, Plaintiff, C.A. No. 15-1158 (LPS) (CJB) v. DOLLAR SHAVE CLUB, INC., DORCO COMPANY LTD. and PACE SHAVE, INC. Defendants.) [PROPOSED] ORDER WHEREAS, Plaintiff, The Gillette Company, has filed a Motion to Enjoin Defendant Pace Shave, Inc. from Continuing Arbitration; and WHEREAS, the Court having considered the respective papers submitted by both parties, in support of, or in opposition to, said motion; IT IS HEREBY ORDERED that: Plaintiff's Motion is **GRANTED**.

UNITED STATES DISTRICT JUDGE

DATED:

CERTIFICATION PURSUANT TO LOCAL RULE 7.1.1

Pursuant to D. Del. LR 7.1.1, counsel for Plaintiff The Gillette Company ("Gillette") hereby certifies that reasonable efforts were made to reach agreement with Defendant Pace Shave, Inc. on the matter set forth in Plaintiff The Gillette Company's Motion to Enjoin Pace Shave, Inc. from Continuing Arbitration, including a verbal meet and confer of involving lead counsel and Delaware counsel on October 11, 2016. The parties were unable to reach an agreement.

/s/ Rodger D. Smith II

Rodger D. Smith II (#3778)

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on October 13, 2016, upon the following in the manner indicated:

John W. Shaw, Esquire Karen E. Keller, Esquire Andrew E. Russell, Esquire SHAW KELLER LLP 300 Delaware Avenue, Suite 1120 Wilmington, DE 19801 Attorneys for Defendants VIA ELECTRONIC MAIL

Charles K. Verhoeven, Esquire
Terry L. Wit, Esquire
Morgan W. Tovey, Esquire
James D. Judah, Esquire
QUINN EMANUEL URQUHART & SULLIVAN, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111
Attorneys for Defendants

VIA ELECTRONIC MAIL

F. Christopher Mizzo KIRKLAND & ELLIS LLP 655 Fifteenth St., N.W. Washington, DC 20005 Attorneys for Defendants VIA ELECTRONIC MAIL

/s/Rodger D. Smith II

Rodger D. Smith II (#3778)